REMARKS

Applicants and the undersigned are most grateful for the time and effort accorded the instant application by the Examiner. The Office is respectfully requested to reconsider the rejections in view of the following remarks.

In the Office Action dated July 27, 2005, pending Claims 1-16 were rejected. Of these claims, Claims 1, 7, 12, 14 and 16 are independent claims; the remaining claims are dependent claims. Claims 1-11 and 16 stand rejected under 35 U.S.C. 103(a) as being obvious over Abir, U.S. Patent Publication No. 2004/0194018 A1, in view of Liddy et al., U.S. Patent No. 6,006,221, and in further view of Sotomayor, U.S. Patent No. 5,842,206. Claims 12 and 13 stand rejected under 35 U.S.C. 103(a) as being obvious over Abir in view of Liddy et al. and Sotomayor and in further view of Lakritz, U.S. Patent No. 6,526,426. Claim 14 stands rejected under 35 U.S.C. 103(a) over Abir in view of Liddy et al. Claim 15 stands rejected over Abir in view of Liddy and in further view of Lakritz. Reconsideration and withdrawal of the present rejections are hereby respectfully requested.

Claim 17 is newly added and is directed toward further novel aspects of the present invention as described and supported in the Applicant's original disclosure. Claim 17 relates to various properties of a search engine template of one embodiment of the present invention. It should be noted this amendment is not in acquiescence of the Office's position on allowability of the claims, but merely made to expedite prosecution.

As the Examiner is assuredly aware, to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 there must be: (1) a suggestion or motivation to modify a reference or combine references; (2) a reasonable expectation of success in making the modification or combination; and (3) a teaching or suggestion to one skilled in the art of all the claim limitations of the invention to which the art is applied. *See In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). In the present instance a *prima facie* case of obviousness has not been demonstrated because the aforementioned requirements have not been satisfied as discussed below. The immediate withdrawal of the present rejections and notice of allowance is, therefore, appropriate.

To provide a broad overview and to reiterate what has been explained in remarks previously submitted to the Office, the present invention relates to a method and system allowing a computer implemented Internet or database search engine query in the native language of the user initiating the search to be accomplished regardless of the language of the search engine used for the search. As an example, in one presently preferred embodiment an Internet search engine is used to implement an Internet search using a query comprising the user's native language. One of the novel aspects of the present invention is the use of an Internet (or database) **search engine's dedicated language**, which may or may not be the same as the user's native language. Thus, through the use of this invention a user is not limited to the retrieval of information that is provided in only their native language. In other words, a user is empowered with the ability to conduct productive searches of the Internet and databases related to information, which would not normally be accessible due to the language barrier between the user's native

language and the language of the information being searched. The importance of such an invention can instantly be recognized in the Internet realm where for example an English speaker is normally precluded from conducting productive searches using search engines related to non-English information.

Before addressing some of the novel aspects of the present invention not found in the prior art, it should first be noted that the following discussion focuses upon the claim elements as set forth in independent Claim 1, but it should be understood that the elements of Claim 1 are representative of the elements contained in the other independent claims; therefore, the arguments now given are equally applicable to all of the independent claims.

In the outstanding Office Action it is indicated that all the elements of Claim 1 have been met by the combined teachings of Abir, Liddy, and Sotomayor. The Applicant respectfully disagrees. The first two elements of Claim 1 are not taught by Abir. Elements (a) and (b) of the claim state, "[r]eceiving an original query request from an Internet user, said original query request containing query words of native language of said user; selecting a suitable search engine from a plurality of search engines, each of said search engines having a respective dedicated language...". In contradistinction, Abir appears to be an invention directed toward a method for providing alternate Internet resource identifiers and addresses. Abir seems to allow for the conversion of URLs to and from a user's native language. [0046] In Paragraph 0050, cited by the Examiner, URLs are translated and displayed in the user's native language using the system's simple dictionary. Finally, Abir at paragraph 0052 also seems to allow for a user searching the

Internet to enter his/her native language by using a dictionary to convert non-English search words into English ones. The present invention does more than merely translating words. The Applicant fails to comprehend how Abir teaches or suggests to one skilled in the art, "selecting a suitable search engine from a plurality of search engines, each of said search engines having a respective dedicated language." Abir is also said to teach element (b) of Claim 1 as further defined by dependent Claim 2. Claim 2 indicates wherein step (b) comprises the step of selecting said search engines from said plurality of designated URLs in said original query request as the selected search engine. Abir fails to teach Claim 2 because Abir merely provides for URL translation not the selection of a search engine based upon the URL of a previously submitted query.

As explained in the Applicant's specification and shown in Fig. 4 the selection of an appropriate search engine and the language to which a search translation is made, in one embodiment, is implemented through the use of predefined templates.

> The templates may be stored in the memory or disk of query translation server and retrieved in a file or database. The templates contain necessary information for the search engines supported by the query translation server, the information is used at step 402 and step 403.
>
> For example, the following templates for search engines may be stored in a template file.

```
yahoo=\
        url=http://search.yahoo.com/bin/search,\
        parameterName=p,\
        language=English,\
        assemblerClass=Generic,\
        dictionaryContext=
ibm=\
        url=http://www.ibm.com:8080/db2search/,\
        parameterName=q;s,\
        language=English,\
        assemblerClass=Generic,\
        dictionaryContext=ibm
```

...

In the example, the first two templates are for Yahoo! and IBM respectively. Every template defines the URL for the search program of the search engine, a list of parameters to be translated in the query command, the specific language acceptable by the search engine, the rule for combination of query terms, and the dictionary context of specific site.

(Pg. 24, line 17 - Pg. 25, line 24)

It is clear that the selection of a search engine as explained and claimed is not taught or suggested by what appears to be a method of URL translation provided by the Abir invention. Moreover, none of the cited prior art overcomes this deficiency. (See below) For this reason alone the obviousness rejections presented in the outstanding Office Action are improper and should be withdrawn since all the elements of the present invention as claimed have not been taught or suggested.

With respect to the further elements of Claim 1 found by the Examiner not to have been taught by Abir, the Office Action indicates, "[L]iddy teaches translation of search query into multiple language (col. 22, lines 30-45); generating search query (col. 8, lines 5-16 and col. 21, lines 10-20); receiving search result and sending back result to user (col. 6, lines 38-48 and col. 8, lines 5-16). Again Applicant respectfully disagrees. As best understood Liddy appears to be related to "[a] document retrieval system where a user can enter a query...in a desired one of a plurality of supported languages, and retrieve documents from a database that includes documents in at least one other language...". (Abstract) To achieve this, it appears, "each document in the database is subjected to a set of processing steps to generate a language-independent conceptual representation of the subject content of the document." (Col. 2, lines 55-58) A "query is also subjected to

a ...set of processing steps to generate a language-independent conceptual representation of the subject content of the query." (Col 2, lines 59-61) "Documents are matched to queries based on the conceptual-level contents of the document and query...". (Col.2, lines 66-67) In other words, it appears that both the database and query are represented by **language-independent** concepts which can, therefore, be related without regard for a particular language. This stands in contrast to the language **dependent** invention presently claimed. The present invention does not change both the query and materials being searched into a language-independent conceptual representation that can then be matched. In fact, element (c) for which Liddy is cited as teaching clearly provides "**translating** said **query words** of native language **into query words** of dedicated language of said selected search engine" (Claim 1)(emphasis added) The language independent invention of Liddy does not teach the presently claimed invention or the elements for which it is cited.

The Examiner draws the Applicant's attention to column 22, lines 35-45 as teaching "translation of search query into multiple language." (Office Action p. 4) However, the referenced section appears to teach a translation of documents retrieved from a search dependent upon the relevance of the conceptual ideas searched by a conceptual query. This section fails to teach translation of a query as claimed. Liddy is also said to teach "generating a search query." Whether this is correct or not is immaterial because what is claimed is "constructing a new query request directed to said selected search engine based on said original query request and said query words of dedicated language". This element is simply not taught by the cited reference nor by any

combination with the other references. Both column 8 and column 21 cited in the Office Action, in fact, deal with "conceptual-level representations of the documents and queries" not the translation of a query into a specific language. For these reasons, Liddy clearly fails to teach or suggest the present invention and, as presented before related to the Abir reference, the obviousness rejection should be withdrawn for this reason alone. Additionally, the deficiencies of Liddy have not be overcome by either Abir or Sotomayor.

Abir and Liddy "do not teach each of said search engines having a respective dedicated language," but it is said that "Sotomayor teaches translating the search expression to a form understandable by each particular search engine (fig. 3, col. 5, lines 8-24)," thereby teaching all of the invention's claimed limitations. (Office Action p. 4) What Sotomayor does appear to actually teach is not the translation of language into the language of a particular search engine, but rather simply the ability to supply various search engines with a combined search phrase. This is clearly indicated in the paragraphs preceding the cited section. Thus for example, a search phrase using Boolean operators entered into Sotomayor's "EchoScarch embodiment" would ensure that the various known search engines conducting the Internet search would be provided a compatible search phrase to conduct the search. The heart of Sotomayor, as best understood, is the way in which gathered information is reorganized related to the concepts contained within the documents being retrieved via general search methods. In any event, Sotomayor fails to teach the identification of a dedicated language of a particular search engine and the translation of a search phrase from one language to that of the dedicated language

associated with a particular search engine. The failure of Sotomayor to teach the element for which it is cited and the fact that the invention stands in contrast to the presently claimed invention again requires the obviousness rejections presently applied to be withdrawn.

For all of the above reasons it is the Applicant's position that the prior art fails to teach or suggest all of the presently claimed limitations of the invention. Thus, one of the essential requirements for a *prima facie* case of obviousness has not been established. However, it is also the Applicant's position that the remaining requirements for finding obviousness have not been established as well.

As indicated at the outset, a motivation must be present in the references themselves or in the knowledge generally available to one of ordinary skill. There is no such motivation to combine the URL/identifier translation method of Abir and the matching of query-concept and document-concept method as provided in the Liddy invention. Liddy is based on the basic idea that concepts transcend language terms and, therefore, Liddy has no need for translated URLs. The same holds true for any combination of Abir with Sotomayor since the latter also relates to reorganizing rather ordinary search results using conceptual ideas instead of ones based on words. Therefore, the translation of URLs, identifiers, and/or particular search phrases would be of no particular use. One skilled in the art would not find a motivation to make the proposed combinations of references cited by the Office.

Finally, the Applicant would also like to note that no expectation of success in making these combinations or any suggestions that such would be possible has been provided. The Applicant suggests that such combinations could not be made and, moreover, the idea of making such combinations to one skilled in the art would not produce the required expectation of success necessary for the implementation of an obviousness rejection.

In view of the foregoing, it is respectfully submitted that independent Claims 1, 7, 12, 14, and 16 fully distinguish over the applied art and are, thus, in condition for allowance. By virtue of dependence from what are believed to be allowable independent Claims 1, 7, 12, 14, and 16, it is respectfully submitted that Claims 2-6, 8-11, 13, 15 and 17 are also presently allowable.

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Atty. Docket No. JP9-1999-0804US1
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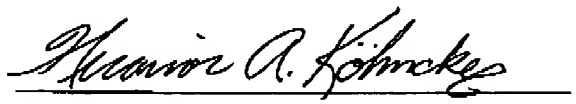
In summary, it is respectfully submitted that the instant application, including Claims 1-17, is presently in condition for allowance. Notice to the effect is hereby earnestly solicited. If there are any further issues in this application, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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